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Attorney for Trustee

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF ARIZONA

9 In re:) In Chapter 7 Proceedings
10 SUSAN MARIA CABRAL;)
11 Debtor.)
12)
13 BRIAN J. MULLEN,)
14 TRUSTEE,)
15 Plaintiff,)
16)
17 v.)
18)
19 SUSAN MARIA CABRAL,)
LIANA HURLEY BLAIR)
aka Liana H. Blair)
aka Liana M. Blair,)
Defendants.)
)

MOTION FOR EXPEDITED HEARING

21 The debtor's sister has over \$100,000.00 that belongs to the
22 bankruptcy estate. The trustee needs to have that money sequestered
23 before it is spent and forever lost. Accordingly, the trustee moves
24 this Court for an expedited hearing on the trustee's Motion For
25 Preliminary Injunction. The trustee's motion is more fully set forth in
26 and is supported by the following Memorandum Of Points and Authorities.

27

28

DATED June 9, 2010.

TERRY A. DAKE, LTD.

By /s/ TD009656

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Attorney for Trustee

MEMORANDUM OF POINTS AND AUTHORITIES

16 On April 30, 2009, \$101,258.65 was transferred from the
17 debtor's account at DFCU account to a new account at DFCU in the name of
18 the debtor's sister, Liana Blair ("Blair"). However, the signature card
19 for that newly created account shows that Blair holds the money for the
20 debtor's benefit.

21 This money, once spent, will likely never be recovered.
22 Accordingly, the trustee requests an expedited hearing on his motion for
23 the entry of a preliminary injunction. At that hearing, the trustee
24 will ask the Court to enter appropriate orders to prevent the further
25 expenditure of those funds. The trustee requests that the hearing be
26 held as soon as possible.

1 **WHEREFORE**, the trustee prays for an expedited hearing on his
2 motion for the entry of a preliminary injunction to prevent further loss
3 or expenditure of these funds.

4 DATED June 9, 2010.

5 **TERRY A. DAKE, LTD.**

6 By /s/ TD009656
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12 Copy e-mailed June 9, 2010 to:

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